

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MARYLAND**

IN RE:

**ARCHIE VERNON VEALE
SIERRA LEONNE VEALE**
Debtor(s)

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Case No.: **17-10243-RAG**

Chapter 13

**THE CHAPTER 13 TRUSTEE'S
REQUESTS FOR ADMISSION OF FACT
TO CLAIMANT, U.S. BANK TRUST, NA**

Nancy Spencer Grigsby, Chapter 13 Trustee, requests U.S. Bank Trust, NA, not later than thirty (30) days after service of this request, admit for the purpose of this action, the truth of the facts stated in section II below, pursuant to Rule 36 of the Federal Rules of Civil Procedure and Rule 7036 of the Federal Rules of Bankruptcy Procedure.

I. Instructions and Definitions

A. If, within thirty (30) days after service upon you, you do not answer or object to the specific facts stated in section II below, the matter is admitted as true for the purposes of this action. Fed. R. Civ. P. 36(a)(3); Fed. R. Bankr. P. 7036.

B. If you object to any request, the reason therefore shall be stated. You may not object solely on the ground that the request presents a genuine issue for trial. Fed. R. Civ. P. 36(a)(5); Fed. R. Bankr. P. 7036.

C. If the requested fact is not admitted, the answer shall specifically deny the matter or set forth in detail the reasons why the answering party cannot truthfully admit or deny the matter.

Fed. R. Civ. P. 36(a)(4); Fed. R. Bankr. P. 7036.

D. You may not give lack of information or knowledge as a reason for failure to admit or deny unless you state that you made reasonable inquiry and that the information known or easily obtainable by you is insufficient to admit or deny the requested fact. Fed. R. Civ. P. 36(a)(4); Fed. R. Bankr. P. 7036.

E. The terms “person” or “persons” includes natural persons, partnerships, corporations and other legal entities.

F. The terms “you” or “your” shall refer to Claimant, U.S. Bank Trust, NA c/o SN Servicing Corporation, as well as any of its officers, directors, agents, employees, representatives and/or attorneys.

G. The term “U.S. Bank Trust, NA c/o SN Servicing Corporation” shall refer to Claimant, U.S. Bank Trust, NA c/o SN Servicing Corporation, as well as any of its officers, directors, agents, employees, representatives and/or attorneys.

I. The term “Debtors” means Archie Vernon Veale and Sierra Leonne Veale, the debtors in this bankruptcy case.

II. Facts to be Admitted

1. The address where notices to U.S. Bank Trust, NA c/o SN Servicing Corporation concerning this bankruptcy case should be sent is, 323 Fifth Street, Eureka, CA 95501.

2. D. Anthony Sottile signed the Transfer of claim filed by U.S. Bank Trust, NA c/o SN Servicing Corporation, which was filed on February 6, 2019.

3. The Corporation Trust, Incorporated is the Maryland Resident Agent for U.S. Bank

Trust, NA.

4. The Corporation Trust, Incorporated is located at 2405 York Rd, Suite 201, Lutherville Timonium, MD 21093.

5. Your proof of claim asserts that you had a secured claim for \$112,484.53. You assert that the amount necessary to cure any default as of the date of the petition was \$21,290.46.

6. The Debtor's Confirmed Plan proposes to pay the entire arrears claim through Trustee distributions.

7. 1509 Kennewick Road, Baltimore, MD 21218 (the "Collateral") was the collateral for your secured claim.

8. On January 3, 2018, you filed a Motion for Relief from Stay, alleging that the Debtor failed to make regular contractual post-petition payments.

9. On February 28, 2019 the Bankruptcy Court entered a Notice of Default and Notice of Termination of Automatic Stay, allowing you to exercise and enforce your state law and contractual rights.

10. You admit that you no longer seek payment through the Chapter 13 Bankruptcy Case.

11. You have not amended your Proof of Claim.

12. You admit that your claim should no longer be allowed as a secured claim.

Date: May 2, 2019

Respectfully submitted,

/s/ Nancy Spencer Grigsby
Nancy Spencer Grigsby
Chapter 13 Trustee

185 Admiral Cochrane Drive, Suite 240
Annapolis, MD 21401
Tel. 301-805-4700
ngrigsby@ch13md.com

CERTIFICATE OF SERVICE

I hereby certify that on the 2nd day of May, 2019, I reviewed the Court's CM/ECF system and it reports that an electronic copy of the Request for Admissions will be served electronically by the Court's CM/ECF system on the following:

David L. Ruben sue@mdbankruptcycenter.com, lindsay@rubenlaw.com
Counsel for Debtor(s)

Gene Jung gene.jung@brockandscott.com, mdecf@brockandscott.com,
wbecf@brockandscott.com, cecily.perry@brockandscott.com
Counsel for New Penn Financial, LLC d/b/a Shellpoint Mortgage Servicing

Mark David Meyer bankruptcy@rosenberg-assoc.com
Counsel for Ditech Financial LLC

Joshua Welborn bankruptcymd@mwc-law.com, bankruptcymd@ecf.inforruptcy.com
Counsel for U.S. Bank Trust, NA

I hereby further certify that on the 2nd day of May, 2019, a copy of the Request for Admissions was also mailed first class mail, postage prepaid to:

Archie Vernon Veale
Sierra Leonne Veale
1509 Kennewick Road
Baltimore, MD 21218
Debtor(s)

Ditech Financial, LLC fka Green Tree Servicing LLC
Attn: Andrew Kusmaul
PO Box 6154
Rapid City, SD 57709
Creditor's Address on Claim

Ditech Financial, LLC fka Green Tree Servicing LLC
Attn: Andrew Kusmaul
PO Box 0049
Palatine, IL 60055
Creditor's Address on Claim

Shellpoint Mortgage Servicing
Attn: Padma Vaghela
PO Box 10675
Greenville, SC 29603
Creditor's Address on Transfer of Claim

New Penn Financial, LLC d/b/a Shellpoint Mortgage Servicing
Attn: Padma Vaghela
PO Box 10675
Greenville, SC 29603
Creditor's Address on Transfer of Claim

SN Servicing Corp.
Attn: Donna Davis
323 5th Street
Eureka, CA 95501
Creditor's Address on Transfer of Claim

U.S. Bank Trust, NA
c/o SN Servicing Corporation
Attn: D. Anthony Sottile
323 Fifth Street
Eureka, CA 95501
Creditor's Address on Transfer of Claim

SN Servicing Corp.
323 Fifth Street
PO Box 35
Eureka, CA 95502
Creditor's Correspondence Address

The Prentice-Hall Corporation System
7 St Paul Street, Suite 820
Baltimore, MD 21202
Resident Agent for SN Servicing Corporation

No Resident Agent Found for Shellpoint Mortgage Servicing

CSC-Lawyers Incorporating Service Company
7 St Paul Street, Suite 820
Baltimore, MD 21202
Resident Agent for New Penn Financial, LLC

The Corporation Trust, Incorporated
2405 York Road, Suite 201
Lutherville Timonium, MD 21093
Resident Agent for Ditech Financial LLC

The Corporation Trust, Incorporated
2405 York Road, Suite 201
Lutherville Timonium, MD 21093
Resident Agent for U.S. Bank, NA

Via certified mail
Mr. Richard K. Davis, CEO
U.S. Bank, N.A.
800 Nicollet Mall
BC-MN-H210
Minneapolis, MN 55402
Officer of U.S. Bank, N.A.

/s/ Nancy Spencer Grigsby
Chapter 13 Trustee